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Attorneys for Plaintiffs
TRAFFICSCHOOL.COM, INC. and
DRIVERS ED DIRECT, LLC, California companies.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TRAFFICSCHOOL.COM, INC.,
a California corporation; DRIVERS
ED DIRECT, LLC, a California
limited liability company,

Plaintiffs,

vs.

EDRIVER, INC., a California
corporation; ONLINE GURU, INC.,
FIND MY SPECIALIST, INC., and
SERIOUSNET, INC., California
corporations; RAVI K. LAHOTI, an
individual; RAJ LAHOTI, an
individual; and DOES 1 through 10,

Defendants.

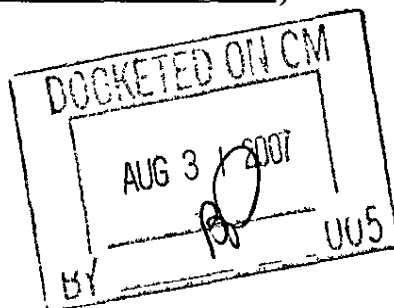
Case No. CV 06-7561 PA (CWx)

The Honorable Percy Anderson

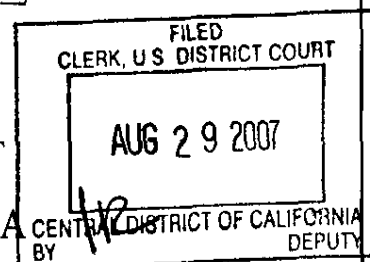
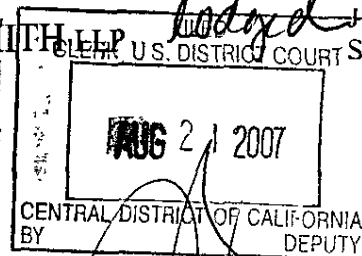
[ERRATA TO] PLAINTIFFS' EX
PARTE APPLICATION AND
[PROPOSED] ORDER TO FILE
UNDER SEAL DOCUMENTS IN
SUPPORT OF THEIR MOTION:

- (1) MEMORANDUM;
- (2) SEPARATE STATEMENT
OF UNDISPUTED FACTS;
AND
- (3) COMPENDIUM OF
DECLARATIONS AND
EXHIBITS

Date: September 10, 2007
Time: 1:30 p.m.
Crtn.: 15



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JS-5/JS-6 ☐
JS-2/JS-3 ☐
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1 TO THE COURT, ALL PARTIES, AND COUNSEL OF RECORD:

2 Pursuant to Local rules 79.5 and 7-19 and the protective order entered in this
3 case, plaintiffs TrafficSchool.com, and Drivers Ed Direct, LLC ("Plaintiffs") hereby
4 apply *ex parte* for permission to file under seal Plaintiffs' Memorandum, Separate
5 Statement of Undisputed Facts, and Compendium of Declarations and Exhibits,
6 which support Plaintiffs' Motion for Summary Judgment.

7 The grounds for this application are that (a) several of the exhibits
8 accompanying the declarations supporting Plaintiffs' motion have been designated
9 by either Plaintiffs and Defendants as "Confidential" or Confidential -
10 Attorneys' Eyes Only"; (b) related confidential information is incorporated into the
11 memorandum and the separate statement of undisputed facts; (c) the memorandum,
12 statement of undisputed facts, and compendium of declarations and exhibits cannot
13 be reviewed without the designated information; and (d) Plaintiffs have filed
14 redacted versions of the aforementioned documents in open court, thereby putting as
15 much information in the public record as possible while protecting and respecting the
16 confidential designations in this case.

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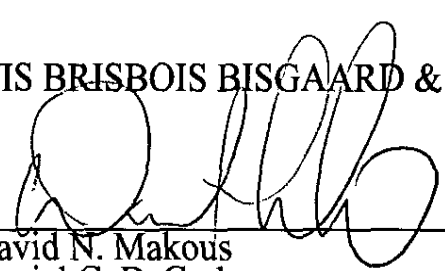
Pursuant to Local Rule 7-19.1, Plaintiffs have provided notice of this application to counsel for Defendants on August 16, 2007 and prior thereto. Counsel for Defendants have indicated that they do not intend to oppose the application.

DATED: August 21, 2007

Respectfully submitted,

LEWIS BRISBOIS BISGAARD & SMITH LLP

By


David N. Makous
Daniel C. DeCarlo
Mina I. Hamilton
Attorneys for Plaintiffs
TRAFFICSCHOOL.COM, INC. and
DRIVERS ED DIRECT, LLC, California
companies.

IT IS SO ORDERED.

DATED: Aug. 29, 2007


UNITED STATES DISTRICT JUDGE

1 **PROOF OF SERVICE**

2 TrafficSchool.com v. Edriver, Inc. - File No. 25162-14

3 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

4 I am employed in the County of Los Angeles, State of California. I am over
5 the age of 18 and not a party to the within action. My business address is 221 North
Figueroa Street, Suite 1200, Los Angeles, California 90012.

6 On August 21, 2007, I served the following document described as **[ERRATA
7 TO] PLAINTIFFS' EX PARTE APPLICATION AND [PROPOSED] ORDER
8 TO FILE UNDER SEAL DOCUMENTS IN SUPPORT OF THEIR MOTION**
on all interested parties in this action by placing ☒ a true copy ☐ the original
thereof enclosed in sealed envelopes addressed as follows:

9 Brian M. Daucher, Esq.
Joseph H. Tadros, Esq.
10 Amy Merlo, Esq.
SHEPPARD MULLIN RICHTER & HAMPTON
11 650 Town Center Drive, 4th Floor
Costa Mesa, California 92626-1925
12 Telephone: (714) 513-5100
bdaucher@sheppardmullin.com
13 jtadros@sheppardmullin.com
amerlo@sheppardmullin.com

14 ☒ (BY MAIL, 1013a, 2015.5 C.C.P.)

15 ☐ I deposited such envelope in the mail at Los Angeles, California. The
16 envelope was mailed with postage thereon fully prepaid.

17 ☒ I am readily familiar with the firm's practice for collection and
18 processing correspondence for mailing. Under that practice, this document will be
deposited with the U.S. Postal Service on this date with postage thereon fully prepaid
19 at Los Angeles, California in the ordinary course of business. I am aware that on
motion of the party served, service is presumed invalid if postal cancellation date or
20 postage meter date is more than one day after date of deposit for mailing in affidavit.

21 ☒ (FEDERAL) I declare that I am employed in the office of a member of the bar
of this Court at whose direction the service was made.

22 Executed on August 21, 2007, at Los Angeles, California.

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25 
26 Vicki Towles
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